

against. Figs. 3A - 6 are exemplary of Ellinas. These figures each deal with an individual node and it can be seen that for each node the protection routes protecting against the failure of the node go out of and return to the node see eg element 413. Connection is through interconnecting protection fibers located within the node. See eg col. 10, line 58- col. 11, line 25. Hence, the protection route must include the node (router) and the protection route cannot be considered to be "around an adjacent router to the protecting router in case of failure of the adjacent router". The Examiner cited Figs. 13 and 14 as showing this feature of claims 1, 29 and 30, but as can be seen clearly from Fig. 13, the cycle groups (protection cycles) for node 2 include node 2. Although cycle 231 (Fig. 2A, col. 9-11) encircles node 211, this path is associated with the node 211 and there is no suggestion in Ellinas that the cycle 231 is defined by an entry in a router table at a protecting router (ie, a router within the cycle 231). By contrast, in the present invention, the router table of Claims 1, 29 and 30 is associated with a protecting router, not the router being protected against.

The contrast between the present invention and Ellinas is clearly showed by Ellinas, col. 5, lines 35-38, which states:

"The data signals that would normally use the failed switch are re-routed on a path made of protection fibers until they reach the other side of the node within the failed switch."

By contrast, the router table of Claims 1, 29 and 30 that defines the alternative route around the protected node is associated with a protecting router. The routers in the alternative route, as noted at page 4, lines 15-16, intercept all traffic flows through the router whose failure is being protected against and therefore cannot route data within the

node as required by Ellinas. This is completely different from Ellinas. Thus, Claims 1, 29 and 30 and all claims dependent on them are patentable over Ellinas.

Independent Claim 17 requires "an ID field that specifies a cycle of routers in which the routers in the cycle are all adjacent a router not in the cycle". Again, Ellinas does not show this because in Ellinas the protection route includes the failed node. The examiner cites col. 18, lines 30-50, but this section, first, does not deal with ID fields of messages, and, second, the table deals with how the protection switches within network nodes 2 and 4 are interconnected. This has nothing to do with a message having within it a specified route that forms a cycle in which the routers in the cycle are all adjacent a router not in the cycle. Nothing in Ellinas suggests a message having the claimed ID field.

Independent Claim 20 is patentable for like reasons over Ellinas, and also it is evident from the above discussion that nothing in Ellinas discusses (A) the notion of a protecting router having an entry identifying a cycle of routers. Ellinas does not use protecting routers at all. Further, Ellinas does not teach (B) the cycle forming an alternative route around an adjacent router to the protecting router. In Ellinas the protecting cycle includes the node being protected. Even further removed from Ellinas is any suggestion that (C) the cycle of routers includes all routers directly connected to the adjacent router and not the adjacent router. Ellinas has no conception of the idea of such a structure that is capable of intercepting all traffic flows to the failed router. In short, Ellinas contains none of these three salient features of Claim 20.

Discussion of the remaining claims is superfluous in view of the irrelevance of the Ellinas to the independent claims.

Therefore, it is respectfully submitted that all claims are patentable. Since the claims, as well as the other parts

of this application are in allowable state, the Applicants
courteously solicit prompt issuance of a Notice of Allowance.

Respectfully submitted,


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